

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

*April 30, 2019*

David J. Bradley, Clerk of Court  
Original file date

UNITED STATES OF AMERICA,

v.

§  
§  
§ Criminal No.: H-4:19-cr-00234-S  
§

(1) ASHLEY YEN NGUYEN, a/k/a "DUYEN";  
Counts 1, 5, 49, 53, 100, 104, 152, 156

UNDER SEAL

(2) KHANH PHUONG NGUYEN;  
Counts 1, 2, 49, 50, 100, 101, 152, 153

United States Courts  
Southern District of Texas  
FILED

(3) TUYEN THAI HUYNH;  
Counts 1, 49, 100, 152

*May 10, 2019*

(4) HUNG PHUOC NGUYEN;  
Counts 1, 49, 100, 152

David J. Bradley, Clerk of Court  
Redacted file date

(6) LAN MINH NGUYEN;  
Counts 1, 47, 49, 98, 100, 150, 152, 202

(7) BINH THANH NGUYEN;  
Counts 1, 48, 49, 99, 100, 151, 152, 203

(10) KRISTINE GUZMAN;  
Counts 1, 8, 49, 56, 100, 107, 152, 159

(11) JANIE GONZALEZ;  
Counts 1, 3, 49, 51, 100, 102, 152, 154

(12) TAM CONG LE;  
Counts 1, 2, 49, 50, 100, 101, 152, 153, 204

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**සාකච්ඡා**

the 1990s, the number of people in the United States who are 65 years of age or older has increased by 50 percent, and the number of people 75 years of age or older has increased by 100 percent. The number of people 85 years of age or older has increased by 200 percent. The number of people 90 years of age or older has increased by 400 percent. The number of people 95 years of age or older has increased by 800 percent. The number of people 100 years of age or older has increased by 1,600 percent. The number of people 105 years of age or older has increased by 3,200 percent. The number of people 110 years of age or older has increased by 6,400 percent. The number of people 115 years of age or older has increased by 12,800 percent. The number of people 120 years of age or older has increased by 25,600 percent. The number of people 125 years of age or older has increased by 51,200 percent. The number of people 130 years of age or older has increased by 102,400 percent. The number of people 135 years of age or older has increased by 204,800 percent. The number of people 140 years of age or older has increased by 409,600 percent. The number of people 145 years of age or older has increased by 819,200 percent. The number of people 150 years of age or older has increased by 1,638,400 percent. The number of people 155 years of age or older has increased by 3,276,800 percent. The number of people 160 years of age or older has increased by 6,553,600 percent. The number of people 165 years of age or older has increased by 13,107,200 percent. The number of people 170 years of age or older has increased by 26,214,400 percent. The number of people 175 years of age or older has increased by 52,428,800 percent. The number of people 180 years of age or older has increased by 104,857,600 percent. The number of people 185 years of age or older has increased by 209,715,200 percent. The number of people 190 years of age or older has increased by 419,430,400 percent. The number of people 195 years of age or older has increased by 838,860,800 percent. The number of people 200 years of age or older has increased by 1,677,721,600 percent. The number of people 205 years of age or older has increased by 3,355,443,200 percent. The number of people 210 years of age or older has increased by 6,710,886,400 percent. The number of people 215 years of age or older has increased by 13,421,772,800 percent. The number of people 220 years of age or older has increased by 26,843,545,600 percent. The number of people 225 years of age or older has increased by 53,687,091,200 percent. The number of people 230 years of age or older has increased by 107,374,182,400 percent. The number of people 235 years of age or older has increased by 214,748,364,800 percent. The number of people 240 years of age or older has increased by 429,496,729,600 percent. The number of people 245 years of age or older has increased by 858,993,459,200 percent. The number of people 250 years of age or older has increased by 1,717,986,918,400 percent. The number of people 255 years of age or older has increased by 3,435,973,836,800 percent. The number of people 260 years of age or older has increased by 6,871,947,673,600 percent. The number of people 265 years of age or older has increased by 13,743,895,347,200 percent. The number of people 270 years of age or older has increased by 27,487,790,694,400 percent. The number of people 275 years of age or older has increased by 54,975,581,388,800 percent. The number of people 280 years of age or older has increased by 109,951,162,777,600 percent. The number of people 285 years of age or older has increased by 219,902,325,555,200 percent. The number of people 290 years of age or older has increased by 439,804,651,110,400 percent. The number of people 295 years of age or older has increased by 879,609,302,220,800 percent. The number of people 300 years of age or older has increased by 1,759,218,604,441,600 percent. The number of people 305 years of age or older has increased by 3,518,437,208,883,200 percent. The number of people 310 years of age or older has increased by 7,036,874,417,766,400 percent. The number of people 315 years of age or older has increased by 14,073,748,835,532,800 percent. The number of people 320 years of age or older has increased by 28,147,497,671,065,600 percent. The number of people 325 years of age or older has increased by 56,294,995,342,131,200 percent. The number of people 330 years of age or older has increased by 112,589,990,684,262,400 percent. The number of people 335 years of age or older has increased by 225,179,981,368,524,800 percent. The number of people 340 years of age or older has increased by 450,359,962,737,049,600 percent. The number of people 345 years of age or older has increased by 900,719,925,474,099,200 percent. The number of people 350 years of age or older has increased by 1,801,439,850,948,198,400 percent. The number of people 355 years of age or older has increased by 3,602,879,701,896,396,800 percent. The number of people 360 years of age or older has increased by 7,205,759,403,792,793,600 percent. The number of people 365 years of age or older has increased by 14,411,518,807,585,587,200 percent. The number of people 370 years of age or older has increased by 28,823,037,615,171,174,400 percent. The number of people 375 years of age or older has increased by 57,646,075,230,342,348,800 percent. The number of people 380 years of age or older has increased by 115,292,150,460,684,697,600 percent. The number of people 385 years of age or older has increased by 230,584,300,921,369,395,200 percent. The number of people 390 years of age or older has increased by 461,168,601,842,738,790,400 percent. The number of people 395 years of age or older has increased by 922,337,203,685,477,580,800 percent. The number of people 400 years of age or older has increased by 1,844,674,407,370,955,161,600 percent. The number of people 405 years of age or older has increased by 3,689,348,814,741,910,323,200 percent. The number of people 410 years of age or older has increased by 7,378,697,629,483,820,646,400 percent. The number of people 415 years of age or older has increased by 14,757,395,258,967,641,292,800 percent. The number of people 420 years of age or older has increased by 29,514,790,517,935,282,585,600 percent. The number of people 425 years of age or older has increased by 59,029,581,035,870,565,171,200 percent. The number of people 430 years of age or older has increased by 118,059,162,071,741,130,342,400 percent. The number of people 435 years of age or older has increased by 236,118,324,143,482,260,684,800 percent. The number of people 440 years of age or older has increased by 472,236,648,286,964,521,369,600 percent. The number of people 445 years of age or older has increased by 944,473,296,573,929,042,739,200 percent. The number of people 450 years of age or older has increased by 1,888,946,593,147,858,085,478,400 percent. The number of people 455 years of age or older has increased by 3,777,893,186,295,716,170,956,800 percent. The number of people 460 years of age or older has increased by 7,555,786,372,591,432,341,913,600 percent. The number of people 465 years of age or older has increased by 15,111,572,745,182,864,683,827,200 percent. The number of people 470 years of age or older has increased by 30,223,145,490,365,729,367,654,400 percent. The number of people 475 years of age or older has increased by 60,446,290,980,731,458,735,308,800 percent. The number of people 480 years of age or older has increased by 120,892,581,961,462,917,470,617,600 percent. The number of people 485 years of age or older has increased by 241,785,163,922,925,834,941,235,200 percent. The number of people 490 years of age or older has increased by 483,570,327,845,851,669,882,470,400 percent. The number of people 495 years of age or older has increased by 967,140,655,691,703,339,764,940,800 percent. The number of people 500 years of age or older has increased by 1,934,281,311,383,406,679,529,881,600 percent. The number of people 505 years of age or older has increased by 3,868,562,622,766,813,359,059,763,200 percent. The number of people 510 years of age or older has increased by 7,737,125,245,533,626,718,119,526,400 percent. The number of people 515 years of age or older has increased by 15,474,250,491,067,253,436,239,052,800 percent. The number of people 520 years of age or older has increased by 30,948,500,982,134,506,872,478,105,600 percent. The number of people 525 years of age or older has increased by 61,897,001,964,269,013,744,956,211,200 percent. The number of people 530 years of age or older has increased by 123,794,003,928,538,027,489,912,422,400 percent. The number of people 535 years of age or older has increased by 247,588,007,857,076,054,979,824,844,800 percent. The number of people 540 years of age or older has increased by 495,176,015,714,152,109,959,649,689,600 percent. The number of people 545 years of age or older has increased by 990,352,031,428,304,219,919,299,379,200 percent. The number of people 550 years of age or older has increased by 1,980,704,062,856,608,439,838,598,758,400 percent. The number of people 555 years of age or older has increased by 3,961,408,125,713,216,879,677,197,516,800 percent. The number of people 560 years of age or older has increased by 7,922,816,251,426,433,759,354,395,033,600 percent. The number of people 565 years of age or older has increased by 15,845,632,502,852,867,518,708,790,067,200 percent. The number of people 570

[REDACTED]

**(31) JUAN ALBERTO VIERA;**  
**Counts 1, 15, 49, 64, 100, 115, 152, 167**

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[REDACTED]

**(35) CUONG NGUYEN;**  
**Counts 1, 18, 49, 66, 100, 118, 152, 170**

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[REDACTED]

**(37) HOA VINH TRUONG;**  
**Counts 1, 19, 49, 68, 100, 120, 152, 172**

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[REDACTED]

**(42) CYNTHIA MONJARAS;**  
**Counts 1, 21, 49, 70, 100, 122, 152, 174**

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**(43) KHANH PHI NGUYEN;**  
**Counts 1, 22, 49, 71, 100, 123, 152, 175**

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[REDACTED]

[REDACTED]

(46) LINH MY TRAN;  
Counts 1, 24, 49, 73, 100, 128, 152, 180

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(47) ADAN ALEXANDER MARTINEZ;  
Counts 1, 24, 49, 73, 100, 128, 152, 180

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[REDACTED]

(49) JOE MANUEL CAZARES III, a/k/a  
JOE MANUEL CAZARES II, a/k/a  
JOE MANUEL CAZARES;  
Counts 1, 25, 49, 75, 100, 127, 152, 179

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(50) HAI THI HONG PHAM;  
Counts 1, 26, 49, 74, 100, 125, 152, 177

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[REDACTED]

(55) TRAN HANH UYEN DO;  
Counts 1, 29, 49, 78, 100, 130, 152, 182

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[REDACTED]

(57) NEIDA NATALIE LUNA;  
Counts 1, 30, 49, 79, 100, 132, 152, 184

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(60) SON TONG LAM; §  
Counts 1, 32, 49, 81, 100, 133, 152, 185 §

[REDACTED]

(62) NHAN NGUYEN NGOC DO; §  
Counts 1, 33, 49, 82, 100, 134, 152, 186 §

[REDACTED]

(64) VIET NGUYEN QUOC LE; §  
Counts 1, 34, 39, 49, 84, 100, 136, 152, 188 §

(65) KEWYN ZURITA; §  
Counts 1, 34, 49, 84, 100, 136, 152, 188 §

[REDACTED]

(67) THOMAS AGUILAR; §  
Counts 1, 35, 49, 83, 100, 135, 152, 187 §

[REDACTED]

(69) MANUEL DEJESUS ROMERO; §  
Counts 1, 36, 49, 85, 100, 137, 152, 189 §

[REDACTED]

(71) MELISSA MARICELA DELFIN; §  
Counts 1, 37, 49, 86, 100, 138, 152, 190 §

[REDACTED]

(73) NICOLE RENEE HERNANDEZ; §  
Counts 1, 38, 49, 87, 100, 139, 152, 191 §

[REDACTED]

**(76) ANTHONY CHARLES CALLEY;**  
**Counts 1, 41, 49, 89, 100, 141, 152, 193**

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**(79) HARLEY DAMIAN;**  
**Counts 1, 43, 49, 91, 100, 143, 152, 195**

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**(80) MINH LE PHAM;**  
**Counts 1, 44, 49, 92, 100, 144, 152, 196**

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**(81) KHRYSTYNA REA GONZALEZ;**  
**Counts 1, 44, 49, 92, 100, 144, 152, 196**

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**(83) ESTEPHANY JANETT MORENO;**  
**Counts 1, 12, 49, 61, 100, 113, 152, 165**

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**(89) HA MY THI NGUYEN;**  
**Counts 49, 96, 100, 148, 152, 200**

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**(90) CRISTOBAL JOSUE VENTURA;**  
**Counts 49, 96, 100, 148, 152, 200**

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(92) ASHLEY GREEN;  
Counts 1, 40, 49, 88, 100, 140, 152, 192

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(96) TRANG LE NGUYEN,  
a/k/a NGUYEN LE THIEN TRANG,  
Counts 49, 59, 205, 206

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Defendants.

### **SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES THAT:

#### **INTRODUCTION**

At all times material to this indictment:

1. (1) ASHLEY YEN NGUYEN, a/k/a DUYEN (hereinafter “DUYEN”) is the leader of a criminal organization based in Southwest Houston, Texas. In addition to having members in Southwest Houston, this criminal organization has associates operating throughout Texas and Vietnam who act in furtherance of its criminal scheme.

2. This criminal organization is operating a large-scale marriage fraud scheme, in which it creates sham marriages in order to illegally obtain admission and immigrant status for aliens in the United States. A “sham” marriage is a marriage that is entered into for the primary purpose of circumventing the immigration laws.

3. DUYEN and her co-conspirators are engaged in a variety of criminal conduct, including, but not limited to, marriage fraud, mail fraud and immigration fraud.

4. Other leaders, organizers, and facilitators of this criminal organization include Defendants (2) KHANH PHUONG NGUYEN, (3) TUYEN THAI HUYNH, (4) HUNG PHUOC NGUYEN, [REDACTED] (6) LAN MINH NGUYEN, (7) BINH THANH NGUYEN, [REDACTED] [REDACTED] (10) KRISTINE GUZMAN, (11) JANIE GONZALEZ, and others known and unknown to the grand jury. (2) KHAN PHUONG NGUYEN is DUYEN's daughter.

5. This criminal organization is using at least 5 residences in Houston, Texas in furtherance of its criminal activities. These include:

- a. 11531 High Star Drive, Houston, Texas 77072;
- b. 4230 Alief Village Drive, Houston, Texas 77072;
- c. 10911 Hazen Street, Houston, Texas 77072;
- d. 11571 Willwood Drive, Houston, Texas 77072;
- e. 11403 Carvel Lane, Houston, Texas 77072; and
- f. 4414 Tufa Court, Houston, Texas 77072.

This criminal organization is also using other locations of operations in Vietnam.

### **IMMIGRATION PROCEDURES**

6. The United States Citizenship and Immigration Services ("USCIS") is a government agency that oversees lawful immigration to the United States and provides the procedures for United States citizens and permanent residents to acquire permanent resident status for their immigration spouses living in the United States and abroad.

7. To perform this function, USCIS requires persons to submit various immigration forms. These forms include:

- a. Form I-130, Petition for Alien Relative ("I-130");



- b. Form I-485, Application to Register Permanent Residence or Adjust Status (“I-485”);
  - c. Form I-751, Petition to Remove Conditions on Residence (“I-751”);
  - d. Form I-864, Affidavit of Support Under Section 213A of the INA (“I-864”);
- and
- e. Form I-129F, Petition for Alien Fiancé(e).

8. A non-citizen may seek to obtain lawful permanent resident status in the United States based upon his/her valid marriage to a United States citizen.

9. The United States citizen in such a marriage who applies for such an immigration benefit is hereinafter referred to as a “petitioner.” The non-citizen in such a marriage who potentially would receive the immigration benefit as a result of that marriage is referred to as the “beneficiary spouse.”

10. Form I-130. To accord the beneficiary spouse “immediate relative” status, a petitioner must file an I-130 with USCIS. In support of the I-130, among other requirements, a petitioner must submit the marriage certificate and indicate where both the petitioner and beneficiary spouse reside and intend to reside.

11. Form I-485. Additionally, to adjust the beneficiary spouse’s immigration status to that of a lawful permanent resident, the beneficiary spouse must file an I-485 with USCIS. In an I-485, the beneficiary spouse must provide his/her complete marital history and residential history for the past five years. The beneficiary spouse must also indicate in the I-485 if he/she has:

- a. “ever submitted fraudulent or counterfeit documentation to any U.S. Government official to obtain or attempt to obtain any immigration benefit, including a visa or entry into the United States;”

b. “ever lied about, concealed, or misrepresented any information on an application or petition to obtain a visa, other documentation required for entry into the United States, admission to the United States, or any other kind of immigration benefit;” and

c. “ever committed a crime of any kind (even if you were not arrested, cited, charged with, or tried for that crime).”

12. There is no waiting period (other than processing) for the beneficiary spouse to adjust his/her status to that of a lawful permanent resident. If the I-130 and I-485 are approved, the beneficiary spouse is accorded conditional permanent resident status. The conditional permanent resident status expires after two years.

13. Form I-864. In addition, the beneficiary spouse must also file a Form I-864 which must be signed under penalty of perjury by the petitioner (i.e., his/her United States citizen spouse), in order to establish the beneficiary spouse has adequate means of financial support and is not likely to rely on the United States government for financial support. In support of an I-864, the beneficiary spouse must submit employment records, asset records, and tax returns of himself/herself, his/her spouse, his/her household members, and/or his/her sponsor in order to establish that their collective income is at least 125 percent of the current Federal poverty line.

14. Form I-751. Within ninety days of the conditional permanent resident status expiration, and in order to have the conditions on the beneficiary spouse’s permanent resident status removed, the petitioner and the beneficiary spouse must file an I-751 with USCIS. Absent certification that the United States citizen spouse is deceased, the marriage ended in divorce, the alien spouse suffered domestic violence from the United States citizen spouse, or the alien spouse would suffer an extreme hardship if deported, the petitioner and beneficiary spouse submitting the

I-751 must certify that the marriage was entered in accordance with the laws of the place where the marriage took place and was not for the purpose of procuring an immigration benefit.

15. Form I-129F. Furthermore, an I-129F is required if a United States citizen is seeking to have a non-citizen fiancé admitted that that they may get married in the United States. An I-129F is submitted by the United States citizen spouse and allows his/her alien fiancé to enter the United States as a nonimmigrant for the purpose of getting married within ninety days of the alien fiancé's arrival. Along with the I-129F, the United States citizen petitioner must also submit evidence that he/she actually met the alien fiancé in person within the prior two years, or that there were extreme hardships or strict and long-established customs of the alien fiancé's culture or social practice prohibiting such an in-person meeting.

16. Persons submitting Forms I-130, I-485, I-864, I-751, and I-129F sign these forms under penalty of perjury and certify all of the information provided is complete, true, and correct.

### **CRIMINAL CONSPIRACY**

17. This criminal organization is operating a large-scale marriage fraud scheme in which it creates sham marriages in order to illegally obtain admission and immigrant status for aliens in the United States. The conspirators will pair aliens seeking these immigration benefits with United States citizens, create sham marriages between them, and then file false forms with USCIS in order to obtain these immigration benefits for the alien. The conspirators receive monetary payments from these aliens and pay the United States citizens a fee for their role in this conspiracy.

18. The marriages entered into through this criminal conspiracy are sham marriages in that, among other things:

a. the spouses do not live together and do not intend to live together, contrary to documents and statements submitted to USCIS;

b. the spouses only meet briefly, immediately before they obtain their marriage license, or not at all;

c. the spouses entered into the marriage pursuant to the financial arrangement described in the following paragraphs; and

d. the spouses enter into the marriage for the primary purpose of circumventing the immigration laws of the United States.

19. Aliens who seek to obtain admission and immigrant status through a sham marriage arranged by this criminal conspiracy are described below as “beneficiary spouses.” In this criminal conspiracy, the beneficiary spouses are non-citizens either living in another country and are seeking admission to the United States, or are in the United States under some temporary non-immigrant status.

20. The United States citizens who enter into sham marriages with these beneficiary spouses are described below as “petitioners.”

21. Each beneficiary spouse entered in an agreement, which is sometimes written, with DUYEN (1) and a company she does business as, in which the beneficiary spouse agrees to pay the criminal organization a total of up to between approximately \$50,000 and \$70,000 to obtain full lawful permanent resident status. These agreements are prorated such that the beneficiary spouse agrees to pay an additional amount for each immigration benefit they receive, including, but not limited to:

a. admission into the United States;

b. conditional permanent resident status, and

c. full lawful permanent resident status.

22. (1) DUYEN and (2) KHANH PHUONG NGUYEN have entered into sham marriages themselves as petitioners for beneficiary spouses.

23. (1) DUYEN, (2) KHANH PHUONG NGUYEN, and others also recruit other United States citizens to act as petitioners in sham marriages. These petitioners receive a portion of the proceeds this criminal organization receives from the beneficiary spouses.

24. Furthermore, several individuals that were recruited as petitioners soon after became recruiters themselves. Such individuals include, but are not limited to [REDACTED] [REDACTED] (10) KRISTINE GUZMAN, and (11) JANIE GONZALEZ.

25. This criminal organization also employs individuals to be in charge of receiving the proceeds from the beneficiary spouses and disbursing the payments to the petitioners. Two such employed individuals are (3) TUYEN THAI HUYNH and (7) BINH THANH NGUYEN.

26. This criminal organization also employs individuals to act as guides for the United States citizen petitioners when they had to travel to Vietnam under the guise that the United States citizen would going to meet his/her fiancé, who, in truth, was a beneficiary spouse paying this criminal organization in order to circumvent United States law. Such individuals include [REDACTED] [REDACTED] [REDACTED] (10) KRISTINE GUZMAN.

27. The criminal organization also prepares, and provides to the petitioner and beneficiary spouse, fake wedding albums containing photographs to make it appear as if they had a wedding ceremony above and beyond a marriage at a courthouse.

28. This criminal organization also employs individuals to act as drivers to take petitioners and beneficiary spouses to their sham marriage ceremonies, appointments with

immigration officials at USCIS, and meetings with immigration document preparers. One such employed individual is [REDACTED]

[REDACTED]

29. For the sham marriages involving non-citizens already in the United States, this criminal organization arranges the filing with USCIS of false Forms I-130, I-485, and I-751.

30. For the sham marriages and potential sham marriages involving non-citizens abroad, this criminal organization arranges the filing of these false forms, as well as false Forms I-129F with USCIS, as well as false applications for non-immigrant B1/B2 tourist visas in which the beneficiary spouse would claim that he/she is seeking to come to the United States for a temporary period as a tourist, but, in truth, was seeking to come to engage in an aforementioned sham marriage.

31. The criminal organization also provides false tax, utility, and employment information, and false documentation in support thereof, in order for USCIS to approve the false immigration forms.

**COUNT ONE**

**(Conspiracy to Engage in Marriage Fraud)**

Paragraphs 1-31 of the Introduction, and Counts 2-48 of this Indictment, are re-alleged and incorporated herein by reference.

From on or about August 9, 2013, and continuing until on or about April 30, 2019, in the Houston Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court,

(1) ASHLEY YEN NGUYEN, a/k/a DUYEN,

(2) KHANH PHUONG NGUYEN,

(3) TUYEN THAI HUYNH,

(4) HUNG PHUOC NGUYEN,

[REDACTED]

(6) LAN MINH NGUYEN,

(7) BINH THANH NGUYEN,

[REDACTED]

[REDACTED]

(10) KRISTINE GUZMAN,

(11) JANIE GONZALEZ,

(12) TAM CONG LE,

[REDACTED]

[REDACTED]

[REDACTED]

(16) RALPH RANDY PATINO,

(17) NAM PHUONG HOANG,

(18) BRANDY LYNN EISLEY,

(19) PHUC HOANG NGUYEN,

(20) SERGIO MARTINEZ, JR.,

(21) UYEN HA BAO TRAN,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(31) JUAN ALBERTO VIERA,

[REDACTED]

[REDACTED]

[REDACTED]

(35) CUONG NGUYEN,

[REDACTED]

(37) HOA VINH TRUONG,

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

(42) CYNTHIA MONJARAS,

(43) KHANH PHI NGUYEN,

[REDACTED]

[REDACTED]

(46) LINH MY TRAN,

(47) ADAN ALEXANDER MARTINEZ,

[REDACTED]

(49) JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II, a/k/a  
JOE MANUEL CAZARES,

(50) HAI THI HONG PHAM,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(55) TRAN HANH UYEN DO,

[REDACTED]

(57) NEIDA NATALIE LUNA,

[REDACTED]

[REDACTED]

(60) SON TONG LAM,

[REDACTED]

(62) NHAN NGUYEN NGOC DO,

[REDACTED]

(64) VIET NGUYEN QUOC LE,

(65) KEWYN ZURITA,

[REDACTED]

(67) THOMAS AGUILAR,

[REDACTED]

(69) MANUEL DEJESUS ROMERO,

[REDACTED]

(71) MELISSA MARICELA DELFIN,

[REDACTED]

(73) NICOLE RENEE HERNANDEZ,

[REDACTED]

[REDACTED]

(76) ANTHONY CHARLES CALLEY,

[REDACTED]

[REDACTED]

(79) HARLEY DAMIAN,

(80) MINH LE PHAM,

(81) KHRYSTYNA REA GONZALEZ,

[REDACTED]

(83) ESTEPHANY JANETT MORENO,

[REDACTED]

(92) ASHLEY GREEN,

[REDACTED]

[REDACTED]

[REDACTED]

defendants herein, did knowingly and willfully conspire, confederate, and agree with one another and with persons known and unknown to the Grand Jury to commit and attempt to commit the following offenses against the United States contained in Counts 2-48, that is the defendants knowingly conspired to enter into marriages for the purpose of evading any provision of the immigration laws of the United States.

3. In furtherance of the conspiracy, and to achieve its objects, the defendants committed the overt acts alleged in Paragraphs 1-31 of the Introduction and Counts 2-48 of this Indictment.

**All in violation of Title 18, United States Code, Section 371.**

**COUNTS TWO THROUGH FORTY-EIGHT**

**(Marriage Fraud)**

On or about the dates set forth below, in the Houston Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants set forth below did knowingly and unlawfully enter into marriage for the purpose of evading a provision of the immigration laws of the United States.

<b>Count</b>	<b>Defendants</b>	<b>Date of Marriage (on or about)</b>
<b>2</b>	[REDACTED] (2) KHANH PHUONG NGUYEN	August 9, 2013
<b>3</b>	[REDACTED] (11) JANIE GONZALEZ	June 11, 2014

Count	Defendants	Date of Marriage (on or about)
4	[REDACTED]	[REDACTED]
5	(1) ASHLEY YEN NGUYEN, a/k/a DUYEN	September 27, 2016
6	(16) RALPH RANDY PATINO	January 25, 2017
7	(17) NAM PHUONG HOANG and (18) BRANDY LYNN EISLEY	July 21, 2017
8	(19) PHUC HOANG NGUYEN and (10) KRISTINE GUZMAN	November 9, 2017
9	(20) SERGIO MARTINEZ, JR.	April 26, 2016
10	(21) UYEN HA BAO TRAN [REDACTED]	November 29, 2017
11	[REDACTED]	[REDACTED]
12	(83) ESTEPHANY JANETT MORENO	November 2, 2015
13	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]
15	(31) JUAN ALBERTO VIERA	November 24, 2015
16	[REDACTED]	[REDACTED]
17	[REDACTED]	[REDACTED]
18	(35) CUONG NGUYEN [REDACTED]	April 19, 2016
19	(37) HOA VINH TRUONG [REDACTED]	June 1, 2016
20	[REDACTED]	[REDACTED]
21	(42) CYNTHIA MONJARAS	August 11, 2016

Count	Defendants	Date of Marriage (on or about)
22	(43) KHANH PHI NGUYEN [REDACTED]	September 30, 2016
23	[REDACTED]	[REDACTED]
24	(46) LINH MY TRAN and (47) ADAN ALEXANDER MARTINEZ	November 4, 2016
25	[REDACTED] (49) JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II, a/k/a JOE MANUEL CAZARES	November 4, 2016
26	(50) HAI THI HONG PHAM [REDACTED]	November 29, 2016
27	[REDACTED]	[REDACTED]
28	[REDACTED]	[REDACTED]
29	(55) TRAN HANH UYEN DO	January 25, 2017
30	[REDACTED] (57) NEIDA NATALIE LUNA	February 10, 2017
31	[REDACTED]	[REDACTED]
32	(60) SON TONG LAM [REDACTED]	February 24, 2017
33	(62) NHAN NGUYEN NGOC DO [REDACTED]	February 28, 2017
34	(64) VIET NGUYEN QUOC LE and (65) KEWYN ZURITA	April 13, 2017
35	[REDACTED] (67) THOMAS AGUILAR	May 9, 2017
36	[REDACTED] (69) MANUEL DEJESUS ROMERO	July 3, 2017
37	[REDACTED] (71) MELISSA MARICELA DELFIN	July 25, 2017
38	[REDACTED] (73) NICOLE RENEE HERNANDEZ	January 8, 2018
39	(64) VIET NGUYEN QUOC LE	October 3, 2018

Count	Defendants	Date of Marriage (on or about)
40	(92) ASHLEY GREEN	March 2, 2018
41	(76) ANTHONY CHARLES CALLEY	April 19, 2018
42		
43	(79) HARLEY DAMIAN	July 24, 2018
44	(80) MINH LE PHAM and (81) KHRYSTYNA REA GONZALEZ	August 6, 2018
45		
46		
47	(6) LAN MINH NGUYEN	September 2, 2015
48	(7) BINH THANH NGUYEN	August 2, 2017

All in violation of Title 8, United States Code, Section 1325(c) and Title 18, United States Code, Section 2.

**COUNT FORTY-NINE**

**(Conspiracy to Commit Mail Fraud)**

1. Paragraphs 1-31 of the Introduction and Counts 1-48 and 50-203 of this Indictment, are re-alleged and incorporated herein by reference.

2. From on or about November 13, 2013, and continuing until on or about April 30, 2019, in the Houston Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court,

(1) ASHLEY YEN NGUYEN, a/k/a DUYEN,

(2) KHANH PHUONG NGUYEN,

(3) TUYEN THAI HUYNH,

(4) HUNG PHUOC NGUYEN,

[REDACTED]

(6) LAN MINH NGUYEN,

(7) BINH THANH NGUYEN,

[REDACTED]

(10) KRISTINE GUZMAN,

(11) JANIE GONZALEZ,

(12) TAM CONG LE,

[REDACTED]

[REDACTED]

[REDACTED]

(16) RALPH RANDY PATINO,

(17) NAM PHUONG HOANG,

(18) BRANDY LYNN EISLEY,

(19) PHUC HOANG NGUYEN,

(20) SERGIO MARTINEZ, JR.,

(21) UYEN HA BAO TRAN,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
(31) JUAN ALBERTO VIERA,  
[REDACTED]  
[REDACTED]  
[REDACTED]

(35) CUONG NGUYEN,  
[REDACTED]

(37) HOA VINH TRUONG,  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

(42) CYNTHIA MONJARAS,

(43) KHANH PHI NGUYEN,  
[REDACTED]  
[REDACTED]

(46) LINH MY TRAN,

(47) ADAN ALEXANDER MARTINEZ,



[REDACTED]

(49) JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II, a/k/a  
JOE MANUEL CAZARES

(50) HAI THI HONG PHAM,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(55) TRAN HANH UYEN DO,

[REDACTED]

(57) NEIDA NATALIE LUNA,

[REDACTED]

[REDACTED]

(60) SON TONG LAM,

[REDACTED]

(62) NHAN NGUYEN NGOC DO,

[REDACTED]

(64) VIET NGUYEN QUOC LE,

(65) KEWYN ZURITA,

[REDACTED]

(67) THOMAS AGUILAR,

[REDACTED]

(69) MANUEL DEJESUS ROMERO,

[REDACTED]

(71) MELISSA MARICELA DELFIN,

[REDACTED]

(73) NICOLE RENEE HERNANDEZ,

[REDACTED]

[REDACTED]

(76) ANTHONY CHARLES CALLEY,

[REDACTED]

[REDACTED]

(79) HARLEY DAMIAN,

(80) MINH LE PHAM,

(81) KHRYSTYNA REA GONZALEZ,

[REDACTED]

(83) ESTEPHANY JANETT MORENO,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(89) HA MY THI NGUYEN,

(90) CRISTOBAL JOSUE VENTURA,

[REDACTED]

(92) ASHLEY GREEN,

[REDACTED]

[REDACTED]

[REDACTED]

(96) TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG,

defendants herein, did knowingly conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to commit the following offenses against the United States: to knowingly and willfully, in violation of Title 18, United States Code, Section 1341, execute a scheme and artifice to defraud United States Citizenship and Immigration Services and obtain fraudulent marriage licenses and immigration benefits based thereon by means of false and fraudulent pretenses, representations, and promises and for the purpose of executing and attempting to execute the above described scheme and artifice to defraud, did place in any post office and authorized depository for mail, the items set forth in Counts 50-99 below on or about the dates set forth therein.

3. In furtherance of the conspiracy, and to achieve its objects, the defendants committed the overt acts alleged in Paragraphs 1-31 of the Introduction, and Counts 1-48 and 50-203 of this Indictment.

**All in violation of Title 18, United States Code, Sections 1349 and 1341.**

**COUNTS FIFTY THROUGH NINETY-NINE**

**(Mail Fraud)**

On or about the dates set forth below, in the Houston Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants set forth in the counts below, aiding and abetting each other and others known and unknown to the Grand Jury, with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent manner, the below-described scheme and artifice to defraud and obtain immigration benefits by materially

false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the below-described scheme and artifice to defraud and obtain immigration benefits, the defendants knowingly placed in a United States Postal Service post office and United States Postal Service authorized depository for mail, to be sent and delivered by the United States Postal Service, the following:

<b>Count</b>	<b>Defendants</b>	<b>Date Deposited in Mail (On or about)</b>	<b>Reason Documents Were Fraudulent</b>	<b>Documents Deposited in Mail</b>
<b>50</b>	(12) TAM CONG LE and (2) KHANH PHOUNG NGUYEN	November 13, 2013	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485,
<b>51</b>	[REDACTED] (11) JANIE GONZALEZ	June 21, 2014	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
<b>52</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<b>53</b>	[REDACTED] (1) ASHLEY YEN NGUYEN	October 12, 2016	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
<b>54</b>	(16) RALPH RANDY PATINO	May 15, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
<b>55</b>	(17) NAM PHUONG HOANG and (18) BRANDY LYNN EISLEY	August 4, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485

<b>Count</b>	<b>Defendants</b>	<b>Date Deposited in Mail (On or about)</b>	<b>Reason Documents Were Fraudulent</b>	<b>Documents Deposited in Mail</b>
<b>56</b>	(19) PHUC HOANG NGUYEN and (10) KRISTINE GUZMAN	November 27, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
<b>57</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<b>58</b>	(20) SERGIO MARTINEZ, JR.	May 11, 2016	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
<b>59</b>	(21) UYEN HA BAO TRAN, [REDACTED] (96) TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG	June 1, 2018	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
<b>60</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<b>61</b>	[REDACTED] (83) ESTEPHANY JANETT MORENO	December 10, 2015	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
<b>62</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Count	Defendants	Date Deposited in Mail (On or about)	Reason Documents Were Fraudulent	Documents Deposited in Mail
63	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
64	(31) JUAN ALBERTO VIERA	March 8, 2016	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
65	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
66	(35) CUONG NGUYEN	May 10, 2016	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
67	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
68	(37) HOA VINH TRUONG	July 7, 2016	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
69	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
70	(42) CYNTHIA MONJARAS	September 16, 2016	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485

Count	Defendants	Date Deposited in Mail (On or about)	Reason Documents Were Fraudulent	Documents Deposited in Mail
71	(43) KHANH PHI NGUYEN [REDACTED]	October 25, 2016	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
72	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
73	(46) LINH MY TRAN and (47) ADAN ALEXANDER MARTINEZ	January 26, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
74	(50) HAI THI HONG PHAM [REDACTED]	January 26, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
75	[REDACTED] (49) JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II, a/k/a JOE MANUEL CAZARES	January 27, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
76	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
77	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
78	(55) TRAN HANH UYEN DO	March 2, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious	I-130, I-485

Count	Defendants	Date Deposited in Mail (On or about)	Reason Documents Were Fraudulent	Documents Deposited in Mail
			addresses, cohabitants, and employment verification letters.	
79	(57) NEIDA NATALIE LUNA	March 7, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
80				
81	(60) SON TONG LAM	March 15, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
82	(62) NHAN NGUYEN NGOC DO	May 15, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
83	(67) THOMAS AGUILAR	June 8, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
84	(64) VIET NGUYEN QUOC LE and (65) KEWYN ZURITA	June 22, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
85	(69) MANUEL DEJESUS ROMERO	July 20, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
86	(71) MELISSA MARICELA DELFIN	August 14, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485



Count	Defendants	Date Deposited in Mail (On or about)	Reason Documents Were Fraudulent	Documents Deposited in Mail
87	(73) NICOLE RENEE HERNANDEZ	January 16, 2018	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
88	(92) ASHLEY GREEN	April 2, 2018	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
89	(76) ANTHONY CHARLES CALLEY	May 3, 2018	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
90				
91	(79) HARLEY DAMIAN	August 2, 2018	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
92	(80) MINH LE PHAM and (81) KHRYSTYNA REA GONZALEZ	August 10, 2018	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
93				
94				

Count	Defendants	Date Deposited in Mail (On or about)	Reason Documents Were Fraudulent	Documents Deposited in Mail
95	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
96	(89) HA MY THI NGUYEN and (90) CRISTOBAL JOSUE VENTURA	December 4, 2016	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
97	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
98	(6) LAN MINH NGUYEN [REDACTED]	November 5, 2015	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485
99	(7) BINH THANH NGUYEN [REDACTED]	September 7, 2017	Documents submitted included forged signatures, false statements under penalty of perjury, and fictitious addresses, cohabitants, and employment verification letters.	I-130, I-485

**All in violation of Title 18, United States Code, Section 1341 and 2.**

**COUNT ONE HUNDRED**

**(Conspiracy to Commit Immigration Fraud)**

1. Paragraphs 1-31 of the Introduction and Counts 1-99, and 101-203 of this Indictment are re-alleged and incorporated herein by reference.

2. From on or about November 18, 2013, and continuing until on or about April 30, 2019, in the Houston Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court,

(1) ASHLEY YEN NGUYEN, a/k/a DUYEN,

(2) KHANH PHUONG NGUYEN,

(3) TUYEN THAI HUYNH,

(4) HUNG PHUOC NGUYEN,

[REDACTED]

(6) LAN MINH NGUYEN,

(7) BINH THANH NGUYEN,

[REDACTED]

(10) KRISTINE GUZMAN,

(11) JANIE GONZALEZ,

(12) TAM CONG LE,

[REDACTED]

[REDACTED]

[REDACTED]

(16) RALPH RANDY PATINO,

(17) NAM PHUONG HOANG,

(18) BRANDY LYNN EISLEY,

(19) PHUC HOANG NGUYEN,

(20) SERGIO MARTINEZ, JR.,

(21) UYEN HA BAO TRAN,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(31) JUAN ALBERTO VIERA,

[REDACTED]

[REDACTED]

[REDACTED]

(35) CUONG NGUYEN,

[REDACTED]

(37) HOA VINH TRUONG,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(42) CYNTHIA MONJARAS,

(43) KHANH PHI NGUYEN,

[REDACTED]

[REDACTED]

(46) LINH MY TRAN,

(47) ADAN ALEXANDER MARTINEZ,

[REDACTED]

(49) JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II,  
a/k/a JOE MANUEL CAZARES

(50) HAI THI HONG PHAM,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(55) TRAN HANH UYEN DO,

[REDACTED]

(57) NEIDA NATALIE LUNA,

[REDACTED]

[REDACTED]

(60) SON TONG LAM,

[REDACTED]

(62) NHAN NGUYEN NGOC DO,

[REDACTED]

(64) VIET NGUYEN QUOC LE,

(65) KEWYN ZURITA,

[REDACTED]

(67) THOMAS AGUILAR,

[REDACTED]

(69) MANUEL DEJESUS ROMERO,

[REDACTED]

(71) MELISSA MARICELA DELFIN,

[REDACTED]

(73) NICOLE RENEE HERNANDEZ,

[REDACTED]

[REDACTED]

(76) ANTHONY CHARLES CALLEY,

[REDACTED]

[REDACTED]

(79) HARLEY DAMIAN,

(80) MINH LE PHAM,

(81) KHRYSTYNA REA GONZALEZ,

[REDACTED]

(83) ESTEPHANY JANETT MORENO,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(89) HA MY THI NGUYEN,

(90) CRISTOBAL JOSUE VENTURA,

[REDACTED]

(92) ASHLEY GREEN,

[REDACTED]

[REDACTED]

[REDACTED]

defendants herein, did knowingly and willfully conspire, confederate, and agree with one another and with persons known and unknown to the Grand Jury to commit and attempt to commit the following offenses against the United States contained in Counts 101-151, that is, the defendants knowingly presented and made under oath and subscribed as true false statements with respect to material facts in immigration documents.

3. In furtherance of this conspiracy, and it achieve its objects, the defendants committed the overt acts alleged in Paragraphs 1-31 of the Introduction and Counts 1-99 and 101-203 of this Indictment.

**All in violation of Title 18, United States Code, Section 371.**

**COUNTS ONE HUNDRED ONE THROUGH ONE HUNDRED AND FIFTY-ONE**

**(Immigration Fraud - False and Fraudulent Statements in Immigration Documents)**

On or about the date set forth in the counts below, in the Houston Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants set forth in the counts below, aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly present and make under oath and subscribe as true under penalty of perjury under 28 U.S.C. § 1746, a false statement with respect to a material fact in an application, affidavit and document required by the immigration laws and regulations prescribed thereunder, in that:

1. Defendants claimed that they resided with the spouse at the address listed and that the letters and documents verifying such joint residence were truthful and not fictitious;

2. Defendants claimed that that they worked at the jobs listed and that the letters verifying such employment were truthful and not fictitious;
3. Defendants claimed that the signatures contained on their immigration documentation and supporting application were not forged; and
4. Defendants answered “no” to the following questions under oath and penalty of perjury:
  - a. Have you ever submitted fraudulent or counterfeit documentation to any U.S. Government official to obtain or attempt to obtain any immigration benefit, including a visa or entry into the United States;
  - b. Have you ever lied about, concealed, or misrepresented any information on an application or petition to obtain a visa, other documentation required for entry into the United States, admission to the United States, or any other kind of immigration benefit; and
  - c. Have you ever committed a crime of any kind (even if you were not arrested, cited, charged with, or tried for that crime),

which statements the defendants described below knew were false because:

1. Defendants knew they did not reside with the spouse at the address indicated and that documents stating they did were not truthful;
2. Defendants knew they did not work at the jobs listed and that letters stating they did were not truthful;
3. Defendants knew that the signatures claiming to be theirs and others they knew were not their own and of the individuals they knew; and
4. Defendants knew that the documentation submitted was fraudulent and such fraudulent documentation was submitted to obtain an immigration benefit, they had lied and made misrepresentations in the documentation submitted which were submitted for immigration benefits, and they had engaged in marriage fraud.

Count	Defendants	Date false statement made and application filed (on or about)	Document in which false statement made
101	(12) TAM CONG LE and (2) KHANH NGUYEN	November 18, 2013	I-130, I-485
102	[REDACTED] (11) JANIE GONZALEZ	June 26, 2014	I-130, I-485
103	[REDACTED]	[REDACTED]	[REDACTED]



Count	Defendants	Date false statement made and application filed (on or about)	Document in which false statement made
104	(1) ASHLEY YEN NGUYEN, a/k/a DUYEN	October 12, 2016	I-130, I-485
105	(16) RALPH RANDY PATINO	May 22, 2017	I-130, I-485
106	(17) NAM PHUONG HOANG and (18) BRANDY LYNN EISLEY	August 14, 2017	I-130, I-485
107	(19) PHUC HOANG NGUYEN and (10) KRISTINE GUZMAN	November 30, 2017	I-130, I-485
108			
109			
110	(20) SERGIO MARTINEZ, JR.	May 16, 2016	I-130, I-485
111	(21) UYEN HA BAO TRAN,	June 1, 2018	I-130, I-485
112			
113	(83) ESTEPHANY JANETT MORENO	December 14, 2015	I-130, I-485
114			
115	(31) JUAN ALBERTO VIERA	March 11, 2016	I-130, I-485
116			
117			
118	(35) CUONG NGUYEN	June 13, 2016	I-130, I-485
119			
120	(37) HOA VINH TRUONG	July 11, 2016	I-130, I-485
121			
122	(42) CYNTHIA MONJARAS	September 19, 2016	I-130, I-485
123	(43) KHANH PHI NGUYEN	October 31, 2016	I-130, I-485

Count	Defendants	Date false statement made and application filed (on or about)	Document in which false statement made
124	[REDACTED]	[REDACTED]	[REDACTED]
125	(50) HAI THI HONG PHAM [REDACTED]	January 31, 2017	I-130, I-485
126	[REDACTED]	[REDACTED]	[REDACTED]
127	(49) JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II, a/k/a JOE MANUEL CAZARES	January 31, 2017	I-130, I-485
128	(46) LINH MY TRAN and (47) ADAN ALEXANDER MARTINEZ	February 2, 2017	I-130, I-485
129	[REDACTED]	[REDACTED]	[REDACTED]
130	(55) TRAN HANH UYEN DO	March 6, 2017	I-130, I-485
131	[REDACTED]	[REDACTED]	[REDACTED]
132	(57) NEIDA NATALIE LUNA	March 13, 2017	I-130, I-485
133	(60) SON TONG LAM [REDACTED]	March 20, 2017	I-130, I-485
134	(62) NHAN NGUYEN NGOC DO [REDACTED]	May 19, 2017	I-130, I-485
135	(67) THOMAS AGUILAR	June 12, 2017	I-130, I-485
136	(64) VIET NGUYEN QUOC LE and (65) KEWYN ZURITA	June 28, 2017	I-130, I-485
137	(69) MANUEL DEJESUS ROMERO	July 26, 2017	I-130, I-485
138	(71) MELISSA MARICELA DELFIN	August 21, 2017	I-130, I-485
139	(73) NICOLE RENEE HERNANDEZ	January 25, 2018	I-130, I-485
140	(92) ASHLEY GREEN	April 5, 2018	I-130, I-485
141	(76) ANTHONY CHARLES CALLEY	May 4, 2018	I-130, I-485
142	[REDACTED]	[REDACTED]	[REDACTED]
143	(79) HARLEY DAMIAN	August 3, 2018	I-130, I-485

Count	Defendants	Date false statement made and application filed (on or about)	Document in which false statement made
144	(80) MINH LE PHAM and (81) KHRYSTYNA REA GONZALEZ	August 10, 2018	I-130, I-485
145	[REDACTED]	[REDACTED]	[REDACTED]
146	[REDACTED]	[REDACTED]	[REDACTED]
147	[REDACTED]	[REDACTED]	[REDACTED]
148	(89) HA MY THI NGUYEN and (90) CRISTOBAL JOSUE VENTURA	December 8, 2016	I-129F
149	[REDACTED]	[REDACTED]	[REDACTED]
150	(6) LAN MINH NGUYEN [REDACTED]	November 9, 2015	I-130, I-485
151	(7) BIN THANH NGUYEN [REDACTED]	September 11, 2017	I-130, I-485

All in violation of Title 18, United States Code, Section 1546(a) and 2.

**COUNT ONE HUNDRED FIFTY-TWO**

**(Conspiracy to Make False Statements Under Oath  
In Matter Relating To Registry of Aliens)**

1. Paragraphs 1-31 of the Introduction and Counts 1-151 and 152-203 of this Indictment are re-alleged and incorporated herein by reference.

2. From on or about November 18, 2013 and continuing until on or about April 30, 2019, in the Houston Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court,

(1) ASHLEY YEN NGUYEN, a/k/a DUYEN,

(2) KHANH PHUONG NGUYEN,

(3) TUYEN THAI HUYNH,

(4) HUNG PHUOC NGUYEN,

[REDACTED]

(6) LAN MINH NGUYEN,

(7) BINH THANH NGUYEN,

[REDACTED]

[REDACTED]

(10) KRISTINE GUZMAN,

(11) JANIE GONZALEZ,

(12) TAM CONG LE,

[REDACTED]

[REDACTED]

[REDACTED]

(16) RALPH RANDY PATINO,

(17) NAM PHUONG HOANG,

(18) BRANDY LYNN EISLEY,

(19) PHUC HOANG NGUYEN,

(20) SERGIO MARTINEZ, JR.,

(21) UYEN HA BAO TRAN,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
(31) JUAN ALBERTO VIERA,  
[REDACTED]  
[REDACTED]  
[REDACTED]

(35) CUONG NGUYEN,  
[REDACTED]

(37) HOA VINH TRUONG,  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

(42) CYNTHIA MONJARAS,

(43) KHANH PHI NGUYEN,  
[REDACTED]  
[REDACTED]

(46) LINH MY TRAN,

(47) ADAN ALEXANDER MARTINEZ,  
[REDACTED]

(49) JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II,  
a/k/a JOE MANUEL CAZARES,

(50) HAI THI HONG PHAM,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(55) TRAN HANH UYEN DO,

[REDACTED]

(57) NEIDA NATALIE LUNA,

[REDACTED]

[REDACTED]

(60) SON TONG LAM,

[REDACTED]

(62) NHAN NGUYEN NGOC DO,

[REDACTED]

(64) VIET NGUYEN QUOC LE,

(65) KEWYN ZURITA,

[REDACTED]

(67) THOMAS AGUILAR,

[REDACTED]

(69) MANUEL DEJESUS ROMERO,

[REDACTED]

(71) MELISSA MARICELA DELFIN,

[REDACTED]

(73) NICOLE RENEE HERNANDEZ,

[REDACTED]  
[REDACTED]

(76) ANTHONY CHARLES CALLEY,

[REDACTED]  
[REDACTED]

(79) HARLEY DAMIAN,

(80) MINH LE PHAM,

(81) KHRYSTYNA REA GONZALEZ,

[REDACTED]

(83) ESTEPHANY JANETT MORENO,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

(89) HA MY THI NGUYEN,

(90) CRISTOBAL JOSUE VENTURA,

[REDACTED]

(92) ASHLEY GREEN,

[REDACTED]  
[REDACTED]  
[REDACTED]

defendants herein, did knowingly and willfully conspire, confederate, and agree with one another and with persons known and unknown to the Grand Jury to commit and attempt to commit the following offenses against the United States contained in Counts 153-203, that is the defendants knowingly made false statements under oath in matters relating to the registry of aliens.

3. In furtherance of this conspiracy, and to achieve its objects, the defendants committed the overt acts alleged in paragraphs 1-31 of the Introduction and Counts 1-151 and 153-203 of this Indictment.

**All in violation of Title 18, United States Code, Section 371.**

**COUNTS ONE HUNDRED FIFTY-THREE THROUGH TWO HUNDRED THREE**

**(False Statements Under Oath In Matters Relating To Registry Of Alien)**

On or about the dates set forth below, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants, aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly make a false statement under oath, namely, those identified in Counts 101-151 in the matters set forth below, which relate to, and are under a law of the United States relating to, the registry of aliens.

<b>Count</b>	<b>Defendants</b>	<b>Date false statement made and application filed (on or about)</b>	<b>Document in which false statement made</b>
<b>153</b>	(12) TAM CONG LE and (2) KHANH NGUYEN	November 18, 2013	I-130, I-485
<b>154</b>	[REDACTED]	[REDACTED]	[REDACTED]
<b>155</b>	[REDACTED]	[REDACTED]	[REDACTED]
<b>156</b>	[REDACTED] (1) ASHLEY YEN NGUYEN, a/k/a DUYEN	October 12, 2016	I-130, I-485
<b>157</b>	(16) RALPH RANDY PATINO	May 22, 2017	I-130, I-485



Count	Defendants	Date false statement made and application filed (on or about)	Document in which false statement made
158	(17) NAM PHUONG HOANG and (18) BRANDY LYNN EISLEY	August 14, 2017	I-130, I-485
159	(19) PHUC HOANG NGUYEN and (10) KRISTINE GUZMAN	November 30, 2017	I-130, I-485
160	[REDACTED]	[REDACTED]	[REDACTED]
161	[REDACTED]	[REDACTED]	[REDACTED]
162	(20) SERGIO MARTINEZ, JR.	May 16, 2016	I-130, I-485
163	(21) UYEN HA BAO TRAN, [REDACTED]	June 1, 2018	I-130, I-485
164	[REDACTED]	[REDACTED]	[REDACTED]
165	(83) ESTEPHANY JANETT MORENO	December 14, 2015	I-130, I-485
166	[REDACTED]	[REDACTED]	[REDACTED]
167	(31) JUAN ALBERTO VIERA	March 11, 2016	I-130, I-485
168	[REDACTED]	[REDACTED]	[REDACTED]
169	[REDACTED]	[REDACTED]	[REDACTED]
170	(35) CUONG NGUYEN	June 13, 2016	I-130, I-485
171	[REDACTED]	[REDACTED]	[REDACTED]
172	(37) HOA VINH TRUONG	July 11, 2016	I-130, I-485
173	[REDACTED]	[REDACTED]	[REDACTED]
174	(42) CYNTHIA MONJARAS	September 19, 2016	I-130, I-485
175	(43) KHANH PHI NGUYEN	October 31, 2016	I-130, I-485
176	[REDACTED]	[REDACTED]	[REDACTED]
177	(50) HAI THI HONG PHAM	January 31, 2017	I-130, I-485

Count	Defendants	Date false statement made and application filed (on or about)	Document in which false statement made
178	[REDACTED]	[REDACTED]	[REDACTED]
179	(49) JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II, a/k/a JOE MANUEL CAZARES	January 31, 2017	I-130, I-485
180	(46) LINH MY TRAN and (47) ADAN ALEXANDER MARTINEZ	February 2, 2017	I-130, I-485
181	[REDACTED]	[REDACTED]	[REDACTED]
182	(55) TRAN HANH UYEN DO	March 6, 2017	I-130, I-485
183	[REDACTED]	[REDACTED]	[REDACTED]
184	(57) NEIDA NATALIE LUNA	March 13, 2017	I-130, I-485
185	(60) SON TONG LAM	March 20, 2017	I-130, I-485
186	(62) NHAN NGUYEN NGOC DO	May 19, 2017	I-130, I-485
187	(67) THOMAS AGUILAR	June 12, 2017	I-130, I-485
188	(64) VIET NGUYEN QUOC LE and (65) KEWYN ZURITA	June 28, 2017	I-130, I-485
189	(69) MANUEL DEJESUS ROMERO	July 26, 2017	I-130, I-485
190	(71) MELISSA MARICELA DELFIN	August 21, 2017	I-130, I-485
191	(73) NICOLE RENEE HERNANDEZ	January 25, 2018	I-130, I-485
192	(92) ASHLEY GREEN	April 5, 2018	I-130, I-485
193	(76) ANTHONY CHARLES CALLEY	May 4, 2018	I-130, I-485
194	[REDACTED]	[REDACTED]	[REDACTED]
195	(79) HARLEY DAMIAN	August 3, 2018	I-130, I-485
196	(80) MINH LE PHAM and (81) KHRYSTYNA REA GONZALEZ	August 10, 2018	I-130, I-485

Count	Defendants	Date false statement made and application filed (on or about)	Document in which false statement made
197	[REDACTED]	[REDACTED]	[REDACTED]
198	[REDACTED]	[REDACTED]	[REDACTED]
199	[REDACTED]	[REDACTED]	[REDACTED]
200	(89) HA MY THI NGUYEN and (90) CRISTOBAL JOSUE VENTURA	December 8, 2016	I-129F
201	[REDACTED]	[REDACTED]	[REDACTED]
202	(6) LAN MINH NGUYEN [REDACTED]	November 9, 2015	I-130, I-485
203	(7) BINH THANH NGUYEN [REDACTED]	September 11, 2017	I-130, I-485

**All in violation of Title 18, United States Code, Section 1015(a) and 2.**

**COUNT TWO HUNDRED FOUR**

**(Unlawful Procurement of Citizenship and Naturalization)**

On or about January 31, 2019, in the Houston Division of the Southern District of Texas,

(12) TAM CONG LE,

the defendant, knowingly procured and attempted to procure, contrary to law, his naturalization, to wit: by knowingly and willfully making under oath and penalty of perjury, material false statements in connection with his application for naturalization, in violation of 18 U.S.C. § 1001, when, during an interview with an official of the United States Department of Homeland Security and on a Form N-400 Application for Naturalization, he falsely claimed that:

- (1) He had never committed a crime or offense for which he was not arrested;
- (2) He had never given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion or removal; and
- (3) He had never lied to any U.S. government official to gain entry or admission into the

United States.

**In violation of Title 18, United States Code, Section 1425(a).**

**COUNT TWO HUNDRED FIVE**

**(Obstructing and Impeding the Due Administration of Justice)**

On or about March 26, 2019, in the Houston Division of the Southern District of Texas,

(96) TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG,

the defendant, did corruptly and by any threatening communication, influence, obstruct and impede and endeavor to influence, obstruct and impede the due administration of justice in a federal grand jury in the United States District Court for the Southern District of Texas, by, after preparing paperwork associated with one or more of the fraudulent marriages identified in this indictment, informing K.M.N.N., an individual who was a party to one of the fraudulent marriages identified in this indictment and whom had provided information on the scheme to federal law enforcement that was the subject of an ongoing grand jury investigation, that K.M.N.N. should, as a result of her providing such information to law enforcement, go into hiding so as to not be found by federal law enforcement, not engage in any air travel that may alert federal law enforcement to her presence, and not provide any further information to law enforcement.

**In violation of Title 18, United States Code, Section 1503(a).**

**COUNT TWO HUNDRED SIX**

**(Tampering With a Witness, Victim, or Informant)**

On or about March 26, 2019, in the Houston Division of the Southern District of Texas,

(96) TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG,

the defendant, did hinder, delay, prevent the communication by K.M.N.N. to Department of Homeland Security Special Agent Paul Skinner and United States Citizenship and Immigration

Services Investigator and Immigration Officer Ronald Mauldin, law enforcement officers, of information relating to the commission of federal offenses, namely, violations of 8 U.S.C. sec. 1325(a), and 18 U.S.C. secs. 371, 1015, 1341, 1349, and 1546(a), and did knowingly attempt, corruptly persuade, and engage in misleading conduct toward K.M.N.N., and cause and induce K.M.N.N. to withhold testimony before a federal grand jury, and be absent from and evade legal process to appear as a witness before a federal grand jury with the intent to influence, delay, and prevent the testimony of K.M.N.N. in an official proceeding, namely a federal grand jury investigation, by, after preparing paperwork associated with one or more of the fraudulent marriages identified in this indictment, informing K.M.N.N., an individual who was a party to one of the fraudulent marriages identified in this indictment and whom had provided information on the scheme to federal law enforcement that was the subject of an ongoing grand jury investigation, that K.M.N.N. should, as a result of her providing such information to law enforcement, go into hiding so as to not be found by federal law enforcement, not engage in any air travel that may alert federal law enforcement to her presence, and not provide any further information to law enforcement.

**In violation of Title 18, United States Code, Section 1512(b).**

**NOTICE OF CRIMINAL FORFEITURE**  
**(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))**

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice to defendants,

**ASHLEY YEN NGUYEN, a/k/a DUYEN,**

**KHANH PHUONG NGUYEN,**

**TUYEN THAI HUYNH,**

**HUNG PHUOC NGUYEN,**

[REDACTED]

**LAN MINH NGUYEN,**

**BINH THANH NGUYEN,**

[REDACTED]

[REDACTED]

**KRISTINE GUZMAN,**

**JANIE GONZALEZ,**

**TAM CONG LE,**

[REDACTED]

[REDACTED]

[REDACTED]

**RALPH RANDY PATINO,**

**NAM PHUONG HOANG,**

**BRANDY LYNN EISLEY,**

**PHUC HOANG NGUYEN,**

**SERGIO MARTINEZ, JR.,**

[REDACTED]

**UYEN HA BAO TRAN,**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**JUAN ALBERTO VIERA,**

[REDACTED]

[REDACTED]

[REDACTED]

**CUONG NGUYEN,**

[REDACTED]

**HOA VINH TRUONG,**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**CYNTHIA MONJARAS,**

**KHANH PHI NGUYEN,**

[REDACTED]

[REDACTED]

**LINH MY TRAN,**

**ADAN ALEXANDER MARTINEZ,**

[REDACTED]

**JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II,  
a/k/a JOE MANUEL CAZARES,**

**HAI THI HONG PHAM,**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**TRAN HANH UYEN DO,**

[REDACTED]

**NEIDA NATALIE LUNA,**

[REDACTED]

[REDACTED]

**SON TONG LAM,**

[REDACTED]

**NHAN NGUYEN NGOC DO,**

[REDACTED]

**VIET NGUYEN QUOC LE,**

**KEWYN ZURITA,**



[REDACTED]

**THOMAS AGUILAR,**

[REDACTED]

**MANUEL DEJESUS ROMERO,**

[REDACTED]

**MELISSA MARICELA DELFIN,**

[REDACTED]

**NICOLE RENEE HERNANDEZ,**

[REDACTED]

[REDACTED]

**ANTHONY CHARLES CALLEY,**

[REDACTED]

[REDACTED]

**HARLEY DAMIAN,**

**MINH LE PHAM,**

**KHRYSTYNA REA GONZALEZ,**

[REDACTED]

**ESTEPHANY JANETT MORENO,**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**HA MY THI NGUYEN,  
CRISTOBAL JOSUE VENTURA),**

[REDACTED]

**ASHLEY GREEN,**

[REDACTED]

[REDACTED]

[REDACTED]

**TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG,**

that in the event of conviction of an offense in violation of Title 18, United States Code, Sections 1341 or 1349 as charged in Counts Forty-Nine through Ninety-Nine of this Indictment or an offense in violation of Title 18, United States Code, Sections 1503 or 1512 as charged in Counts Two Hundred Five and Two Hundred Six of this Indictment, all property, real or personal, which constitutes or is derived from proceeds traceable to such violation is subject to forfeiture.

**NOTICE OF CRIMINAL FORFEITURE**  
**(18 U.S.C. § 982(a)(6))**

Pursuant to Title 18, United States Code, Section 982(a)(6), the United States gives notice to Defendants

**ASHLEY YEN NGUYEN, a/k/a DUYEN,**

**KHANH PHUONG NGUYEN,**

**TUYEN THAI HUYNH,**

**HUNG PHUOC NGUYEN,**

[REDACTED]

**LAN MINH NGUYEN,**

**BINH THANH NGUYEN,**

[REDACTED]

[REDACTED]

**KRISTINE GUZMAN,**

**JANIE GONZALEZ,**

**TAM CONG LE,**

[REDACTED]

[REDACTED]

[REDACTED]

**RALPH RANDY PATINO,**

**NAM PHUONG HOANG,**

**BRANDY LYNN EISLEY,**

**PHUC HOANG NGUYEN,**

**SERGIO MARTINEZ, JR.,**

[REDACTED]

**UYEN HA BAO TRAN,**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
**JUAN ALBERTO VIERA,**  
[REDACTED]  
[REDACTED]  
[REDACTED]

**CUONG NGUYEN,**  
[REDACTED]

**HOA VINH TRUONG,**  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**CYNTHIA MONJARAS,**

**KHANH PHI NGUYEN,**  
[REDACTED]  
[REDACTED]

**LINH MY TRAN,**

**ADAN ALEXANDER MARTINEZ,**  
[REDACTED]

**JOE MANUEL CAZARES III, a/k/a JOE MANUEL CAZARES II,  
a/k/a JOE MANUEL CAZARES**

**HAI THI HONG PHAM,**  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
**TRAN HANH UYEN DO,**

[REDACTED]  
**NEIDA NATALIE LUNA,**

[REDACTED]  
**SON TONG LAM,**

[REDACTED]  
**NHAN NGUYEN NGOC DO,**

[REDACTED]  
**VIET NGUYEN QUOC LE,**

**KEWYN ZURITA,**

[REDACTED]  
**THOMAS AGUILAR,**

[REDACTED]  
**MANUEL DEJESUS ROMERO,**

[REDACTED]  
**MELISSA MARICELA DELFIN,**

[REDACTED]  
**NICOLE RENEE HERNANDEZ,**

[REDACTED]  
**ANTHONY CHARLES CALLEY,**

[REDACTED]  
[REDACTED]  
**HARLEY DAMIAN,**  
**MINH LE PHAM,**  
**KHRYSTYNA REA GONZALEZ,**

[REDACTED]  
**ESTEPHANY JANETT MORENO,**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**HA MY THI NGUYEN,**  
**CRISTOBAL JOSUE VENTURA,**

[REDACTED]  
**ASHLEY GREEN,**

[REDACTED]  
[REDACTED]  
[REDACTED]  
that in the event of conviction of a violation of, or a conspiracy to commit a violation of, Title 18,  
United States Code, Section 1546 as charged in Counts One Hundred through One Hundred Fifty-

One of this Indictment or a violation of Title 18, United States Code, Section 1425 as charged in Count Two Hundred Four of this Indictment, the following is subject to forfeiture:

- (1) all conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense(s);
- (2) all real and personal property that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense(s); and
- (3) all real and personal property that is used to facilitate, or is intended to be used to facilitate, the commission of the offense(s).

**Specific Property**

The property subject to forfeiture includes, but is not limited to, the following:

- (1) The real property, including all improvements and appurtenances, located at 11531

High Star Drive, Houston, Texas 77072 and legally described as:

Lot One Hundred Sixty-One (161), in Block Seven (7), of the partial replat of Brays Forest, Section Two (2), a subdivision of Harris County, Texas, according to the map or plat thereof recorded in Volume 161, Page 51 of the Map Records of Harris County, Texas.

- (2) The real property, including all improvements and appurtenances, located at 4230 Alief

Village Drive, Houston, Texas 77072 and legally described as:

Lot 21, in Block 1, in Alief Village Patio Homes, a subdivision in Harris County, Texas according to the map or plat recorded in Volume 289, Page 54 of the Map Records of Harris County, Texas.

- (3) The real property, including all improvements and appurtenances, located at 10911

Hazen Street, Houston, Texas 77072 and legally described as:

Lot Sixteen (16), in Block Sixteen (16), of IMPERIAL POINT, SECTION SIX (6), a subdivision in Harris County, Texas, according to the map or plat thereof recorded in Volume 148, Page 98 in the Map Records of Harris County, Texas.

- (4) The real property, including all improvements and appurtenances, located at 11571

Willwood Drive, Houston, Texas 77072 and legally described as:

A tract of land out of Reserve "G" of Brays Forest, Section 5, an addition in Harris County, Texas, according to the map or plat thereof, recorded in Volume 234, Page 120 of the Map Records of Harris County, Texas said tract being more particularly described by metes and bounds on a Warranty Deed with Vendor's Lien dated September 19, 2016 and recorded in the Harris County real property records under number 2016-424647.

- (5) The real property, including all improvements and appurtenances, located at 11403

Carvel Lane, Houston, Texas 77072 and legally described as:

Lot Nine (9), in Block Six (6), of BELLAIRE WEST, SECTION SEVEN (7), an addition in Harris County, Texas according to the map or plat thereof recorded in Volume 149, Page 1 of the Map Records of Harris County, Texas.

- (6) The real property, including all improvements and appurtenances, located at 4414 Tufa

Ct, Houston, Texas 77072 and legally described as:

Lot 74, in Block 3, of Brays Forest, Section 1, a subdivision in Harris County, Texas, according to the map or plat thereof recorded in Volume 147, Page 137, of the map and/or plat records of Harris County, Texas.

### **Money Judgment**

The United States may seek the imposition of a money judgment.

### **Substitute Assets**

In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants in substitution.



A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
United States Attorney, Southern District of Texas

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Adam Laurence Goldman  
Assistant United States Attorney  
Adam.Goldman2@usdoj.gov

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Michael Edward Day  
Assistant United States Attorney  
Michael.Day@usdoj.gov

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Eun Kate Suh  
Assistant United States Attorney  
Eun.Suh@usdoj.gov